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AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Janette Harrison  
(AKA Jeanette Harrison)

CASE NO. 2:22-cv-01811-RAJ  
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☐ Yes ☐ No

Plaintiff(s),

v.

University of Washington

Gino Aisenberg; Tomitha Blake

Gary Farris; Dave Eaton; Lisa Hanna  
Mindy Kornberg; Beth Louie; Erin Rice  
Dan Peterson Defendant(s).  
Joy Williamson-Lott

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Janette Harrison (AKA Jeanette Harrison)</u>
Street Address	<u>7320-32nd Avenue South</u>
City and County	<u>Seattle, WA King County</u>
State and Zip Code	<u>Washington 98118</u>
Telephone Number	<u>206-310-6085</u>

Defendants

## Defendant #5

Mindy Kornberg  
 Vice President, UW Human Resources  
 UW, Human Resources, BOX 354960  
 Seattle, King County  
 Washington, 98105-4960  
 206-685-4739

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## Defendant #6

Beth Louie  
 Investigation & Resolution Specialist  
 UW Compliance Service Department  
 University Complaint Investigation  
 and Resolution Office  
 UW, BOX 354996  
 Seattle, King County  
 Washington, 98105-4996  
 206-616-7108

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## Defendant #7

Erin Rice, Assistant Vice President  
 PRES. Human Resources  
 UW, Campus HR Operations and  
 Services, BOX 354963-4963  
 Seattle, King County  
 Washington, 98105-4963  
 206-543-2354 & 206-897-1670

Defendants

Defendant #8 Dan Peterson  
Retired Vice President of  
Development; UW Foundation

Defendant #9 Joy Williamson-Lott  
Graduate School Dean  
UW, Box 353770  
Seattle, King County  
Washington; 98105-3770

Defendant #10 Julie Brown  
Associate Vice President, Operating  
& Budget Officer, Pres;  
University Advancement  
UW, Box 359504  
433 Brooklyn Avenue NE  
Seattle, King County  
Washington; 98105-9504

## B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name

Gino Aisenberg; Former

Job or Title (if known)

Graduate School Associate Dean;

Street Address

UW - School of Social Work, Box 354900

City and County

Seattle; King County

State and Zip Code

Washington 98195-4900

Telephone Number

206-616-9365

## Defendant No. 2

Name

Tomitha Blake; Asst. Vice Provost  
Advancement Constituency

Job or Title (if known)

UW - Gerberding Gerberding Hall

Street Address

Box 351210

City and County

Seattle; King County

State and Zip Code

Washington 98195-1210

Telephone Number

206-221-6063

## Defendant No. 3

Name

GARY FARRIS; Former Executive  
Director & Finance Director, Graduate  
School; Associate Dean, Finance

Job or Title (if known)

&amp; Resources; School of Dentistry

Street Address

UW 35B UW Box 356305

City and County

Seattle; King County

State and Zip Code

Washington 98105-6305

Telephone Number

206-616-9158

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

Lisa Hanna, Director, Employee  
Relations; HR, Campus HR Operations  
and Services  
UW, Campus HR, Box 354963  
Seattle, King County  
Washington, 98105-4963  
206-543-2354 & 206-685-7575

## II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

- ① Breach of contract; ② employment discrimination  
③ wrongful termination; ④ unsafe workplace conditions;  
⑤ misclassification; ⑥ ~~retaliation~~ retaliation; ⑦ workplace injuries  
⑧ Violation of civil rights



## B. If the Basis for Jurisdiction Is Diversity of Citizenship

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual.

The plaintiff (name) Janette (Jeanette) Harrison, is a citizen of the  
State of (name) Washington.

## b. If the plaintiff is a corporation.

The plaintiff, (name) University of Washington, is incorporated under  
the laws of the State of (name) University of Washington, is incorporated under  
the laws of the State of (name) University of Washington, and has its principal  
place of business in the State of (name) Washington state.

(If more than one plaintiff is named in the complaint, attach an additional page providing  
the same information for each additional plaintiff.)

2. The Defendant(s) University of Washington and more  
please see attached list.

## a. If the defendant is an individual.

The defendant, (name) \_\_\_\_\_, is a citizen of the  
State of (name) N/A. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

## b. If the defendant is a corporation.

The defendant, (name) University of Washington, is incorporated under  
the laws of the State of (name) Washington state, and has its principal  
place of business in the State of (name) Washington state.

Or is incorporated under the laws of (foreign nation) N/A,  
and has its principal place of business in (name) N/A.

(If more than one defendant is named in the complaint, attach an additional page  
providing the same information for each additional defendant.)

3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

Working at UW was war. I worked smart and hard, giving my best everyday. The stress and strain on my body at a cellular level remains. Falling down a flight of stairs, because I wasn't provided a suitable workspace per the Family Educational Rights and Privacy Act, I have injuries needing physical therapy for the rest of my life

III. STATEMENT OF CLAIM

to stay healthy as I age. Thus, I'm requesting \$15 million.

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A few months short of working at the University of Washington (UW) for 15 years, I was forced to resign. ~~On the term~~ This resignation ended a 4 year battle to receive an equitable salary and opportunities, ~~Reactive~~ pay ~~and safe work conditions and cell phone reimbursements.~~

Throughout this time, I shared these challenges/obstacles w/ UW leaders in numerous departments, including HR, Advancement, Diversity Equity & Inclusion, Graduate School and University Complaint Investigation and Resolution Office. Unfortunately, my efforts didn't help. I was labeled a problem and lost my job.

IV. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Workplace injuries/treatment failure to pay cell reimbursement  
loss/misclassification of salary, savings & investments  
mental health issues

V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
4 identified, will likely have evidentiary support after a reasonable opportunity for further  
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related  
8 papers may be served. I understand that my failure to keep a current address on file with the  
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing:

24th December 22, 2022

11 Signature of Plaintiff

Janette (Janette) Harrison

12 Printed Name of Plaintiff

Janette (Janette) Harrison

13  
14 Date of signing:

N/A

15 Signature of Plaintiff

N/A

16 Printed Name of Plaintiff

N/A

17  
18 Date of signing:

N/A

19 Signature of Plaintiff

N/A

20 Printed Name of Plaintiff

N/A



JS 44 (Rev. 04/21)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

(b) County of Residence of First Listed Plaintiff King  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
NA

**DEFENDANTS**

County of Residence of First Listed Defendant King County  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)  
N/A

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input checked="" type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input checked="" type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>LABOR</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 1309	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input checked="" type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 1309 <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 1309

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

**VI. CAUSE OF ACTION**

Brief description of cause: Civil Right; Breach of contract

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE N/A

DOCKET NUMBER N/A

DATE 12-22-2022 SIGNATURE OF ATTORNEY OF RECORD [Signature]

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT 20000 APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## UNITED STATES DISTRICT COURT

Western District of Washington

Janette Harrison  
(AKA Jeanette Harrison)

Plaintiff

vs.

University of Washington  
Cino Aisenberg; Tomina Blake  
Dave Eaton; Gary Farris; Lisa Hanna

Defendant(s)

Case Number: \_\_\_\_\_

**DECLARATION AND APPLICATION  
TO PROCEED IN FORMA PAUPERIS  
AND WRITTEN CONSENT FOR  
PAYMENT OF COSTS**

**DECLARATION AND APPLICATION TO PROCEED IN FORMA PAUPERIS**

I (print your name) Janette Harrison declare I am the plaintiff in this case; I believe I am entitled to relief; and I am unable to pay the costs of this proceeding or give security therefor. The nature of my action is *briefly* stated as follows:

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RE

In support of this application, I answer *all* of the following questions:

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY

BY

1. Are you presently employed?

☐ Yes Total amount of net monthly salary (take home pay) \$ N/A

Name and address of employer N/A

☒ No Date of last employment 7/29/22 Total amount of last net monthly salary \$ 16,507.83

2. If married, is your spouse presently employed? ☒ Not married

☐ Yes Total amount of spouse's net monthly salary (take home pay) \$ N/A

Name and address of employer Everett Housing Authority; 3107 Colby Avenue  
Everett, WA 98201

☐ No Date of spouse's last employment N/A Total amount of last net monthly salary \$ N/A

3. For the past twelve months, list the amount of money you and/or your spouse have received from any of the following sources.

a. Business, profession or other self-employment	\$ <u>23,000.00</u>
b. Income from rent, interest or dividends	\$ <u>0</u>
c. Pensions, annuities or life insurance payments	\$ <u>0</u>
d. Disability, unemployment, workers compensation or public assistance	\$ <u>0</u>
e. Gifts or inheritances	\$ <u>0</u>
f. Money received from child support or alimony	\$ <u>0</u>
g. Describe any other source of income <u>0</u>	\$ <u>0</u>

4. List the amount for each of the following for you and/or your spouse:

Cash on hand \$ 15.00      Checking Account \$ 70.00      Savings Account \$ 0

5. Do you and/or your spouse own or have any interest in any real estate, stocks, bonds, notes, retirement plans, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)? If Yes, describe the property and state its approximate value:

☐ Yes

☒ No

N/A \$ N/A

6. Are any persons dependent upon you or your spouse for support? If Yes, state their relationship to you or your spouse, and indicate how much is contributed toward their support each month. (Do not include names of minor children.)

☐ Yes

☒ No

N/A \$ N/A

7. Describe the types of monthly expenses you incur, such as housing, transportation, utilities, loan payments, or other regular monthly expenses and the amount spent each month.

Mortgage; house insurance; transportation; electric and H<sub>2</sub>O; phone & internet \$ 5,410

8. Provide any other information that will help explain why you cannot pay court fees and costs.

Currently I am unemployed with zero income while looking for fulltime work.

I declare under penalty of perjury that the foregoing is true and correct.

12/22/2022 Janette Harrison (Jeanette Harrison)  
Executed on: (Date)      Signature of Plaintiff (Required)

### WRITTEN CONSENT FOR PAYMENT OF COSTS UNDER LOCAL RULE CR3(c)

I, (print your name) JANETTE HARRISON (AKA JEANETTE HARRISON)

hereby consent that any recovery in damages that I may receive in the above-captioned cause may be reduced, if so directed by the court, in such an amount as is necessary for payment of the unpaid fees and costs which are taxed against me in the course of this litigation.

12/22/2022 Janette Harrison (Jeanette Harrison)  
Executed on: (Date)      Signature of Plaintiff (Required)